

Michael Roberts - Re: recent surveillance

**From:** Michael Roberts  
**To:** Internet:wrellis@woodlamping.com  
**Date:** 3/17/04 7:56AM  
**Subject:** Re: recent surveillance

Bill

I expect you to supplement discovery by providing me with copies of all recent surveillance including surveillance form last week and all other supplementary materials. Let me know if I need to add this to the list of items I'm raising with J Beckwith.

Michael A. Roberts  
Graydon Head & Ritchey LLP  
1900 Fifth Third Center  
511 Walnut Street  
Cincinnati, Ohio 45202-3157  
Direct Dial (513) 629-2799  
Fax (513) 651-3836  
mroberts@graydon.com  
www.graydon.com

**CC:** Roberts, Michael

Michael Roberts - RE: recent surveillance

**From:** "William R. Ellis" <WREllis@WoodLamping.com>  
**To:** "Michael Roberts" <mroberts@Graydon.com>  
**Date:** 3/22/04 8:54AM  
**Subject:** RE: recent surveillance

Mike, Based on your earlier E-mail concerning pretext calls, I asked my client if they had performed any additional surveillance or pretext calls and was advised that no surveillance or pretext calls had been performed since the last surveillance in the claims file produced to you.

-----Original Message-----

From: Michael Roberts [mailto:mroberts@Graydon.com]  
Sent: Wednesday, March 17, 2004 7:56 AM  
To: William R. Ellis  
Cc: Michael Roberts  
Subject: Re: recent surveillance

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**From:** Michael Roberts  
**To:** "WREllis@WoodLamping.com".GWIA.Graydon\_Head\_&\_Ritchey  
**Date:** 3/22/04 8:59AM  
**Subject:** RE: recent surveillance

You still haven't produced to me the various bates labeled surveillance materials identified in my March 8 letter and my motion. Why?

>>> "William R. Ellis" <WREllis@WoodLamping.com> 03/22/04 09:00AM >>>  
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[www.graydon.com](http://www.graydon.com)

**CC:** Roberts, Michael

**From:** Michael Roberts  
**To:** Internet:pmburrell@woodlamping.com; Internet:wrellis@woodlamping.com  
**Date:** 4/7/04 7:21AM  
**Subject:** Have you ever read the rules of Procedure or Code Of Prof Responsibility?

It would be so unlike you guys to not produce information so I was shocked to see the following on your purported exhibit list (any chance they'll get to trial without production to me months ago????):

- 1.Ohio Valley Karting Association Board Minutes 3/2/04
- 2.Ohio Valley Karting Association Race Participation Ledger
- 3.Photos of Plaintiff and his various vehicles in show competitions and road rallies.
4. Photos and videotapes of Plaintiff's activities through surveillance.

**CC:** Roberts, Michael